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January 17, 2025

VIA ECF

Hon. Jesse M. Furman, USDJ
Southern District of New York
40 Foley Square
New York, NY 10007

Re: *Potapova v. Toyota Motor Credit Corporation*
Index: 1:23-cv-00571-JMF

Your Honor:

My firm is Co-Counsel for Plaintiff in the above-referenced matter. Pursuant to Section 6.F. of Your Honor's Individual Rules and Practices in Civil Cases, the Parties jointly request that the Court enlarge the deadlines by which the Parties are to respond to the opponent's motions in limine. (ECFs 66, 67.) Those Motions were filed January 16, 2025, and by the Court's Practices, responses are due January 23, 2025. FURMAN INDIV. PRACTICES § 6.F.i. The Parties request that the Court grant a six-day enlargement to that deadline, making the response briefs due January 29, 2025. Because good cause exists to enlarge the deadline, the Court should grant the Motion.

The Parties completed the required pretrial filings in this matter on January 16, 2025. (ECF 73.) To prepare the materials for filing per the Court's guidelines, the Parties had to prioritize that filing over other work. So that they may now attend to those other tasks and deadlines while also devoting the necessary attention to briefing the pending motions in limine in this case, additional time is necessary. They therefore jointly request that the Court grant their Motion and enlarge the deadline.

This is the Parties' first request to enlarge the deadline by which they are to respond to motions in limine. This request is not made for reasons of delay or other purpose, and this request will not impact any other deadlines in the case because there are none.

Based on the foregoing, the Parties therefore request that the Court grant this Motion and enlarge the Parties' deadline to file their responses to motions in limine to January 29, 2025.

We thank the Court for its consideration of this request.

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Respectfully,

/s/ Craig C. Marchiando
Craig C. Marchiando, Esq.
Counsel for Plaintiff

/s/ Dafney Dubuisson Stokes
Dafney Dubuisson Stokes, Esq.
Counsel for Defendant

Application GRANTED. The Clerk of Court is
directed to terminate ECF No. 74.

SO ORDERED.

A handwritten signature in black ink, appearing to be "Jan [unclear]", written in a cursive style.

January 21, 2025